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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

May 7, 2001

VIA COURIER

Magalie Roman Salas, Esq.  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Re: **NOTICE OF EX PARTE MEETING**  
CC Docket No. 94-102/  
RM-8143  
Compatibility with Enhanced 911 Emergency Calling Systems

Dear Ms. Salas:

On May 4, 2001, Terry Garner, President, Grayson Wireless Division ("Grayson") of Allen Telecom, Inc. ("Allen"), George Marble, Vice President, Marketing of Grayson and I had an *ex parte* meeting with representatives of the Wireless Telecommunications Bureau ("Bureau") regarding the above-referenced docket. Representing the Bureau were Thomas Sugrue, Chief, Wireless Telecommunications Bureau, James D. Schlichting, Deputy Chief, Wireless Telecommunications Bureau, Kelly A. Quinn, Legal Advisor, Wireless Telecommunications Bureau, Kris A. Monteith, Chief, Policy Division, and Blaise A. Scinto, Deputy Chief, Policy Division.

We provided an overview of Grayson and of the Geometrix® network-based wireless E-911 Phase II location system. We explained that Geometrix® is compatible with all cellular and PCS handsets that use the AMPS, CDMA, TDMA and iDEN air interfaces. For each of these air interfaces, Geometrix® has been tested and the performance of Geometrix® is equal to or better than the Commission's requirements for E911 Phase II. We explained that compatibility with the GSM air interface is in development and is scheduled for commercial availability during the second quarter of 2001 in all Geometrix® systems. Grayson is fully confident that the performance of Geometrix® with GSM will also meet or exceed Commission E911 Phase II requirements. We noted that Grayson has established capacity to manufacture Geometrix® in sufficient quantities to meet significant carrier demand.

Geometrix® has been designed so that software upgrades for any of the supported air interfaces can take place remotely. Therefore, it will be very easy to download GSM capability in those Geometrix® systems that have already been deployed. This is also true for any similar upgrades that will be developed in the future. Thus, the Geometrix® hardware will not suffer

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from obsolescence, and carriers can be assured that a single Geometrix® system will support any combination of air interfaces and frequencies.

Because of the various waiver requests that have been filed, the wireless industry is presently waiting for the Commission to reaffirm its resolve to maintain and enforce the E911 Phase II rules as promulgated. Until this happens, it appears as though many wireless carriers will delay deployment of E911 Phase II. Therefore, we urged the Bureau to move quickly in acting upon the various pending waiver requests and to reaffirm the Commission's rules as stated so that the public will receive the needed benefit of E911 location technology.

We handed out a slide presentation during the meeting. A copy is attached.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Eliot J. Greenwald', with a long horizontal flourish extending to the right.

Eliot J. Greenwald

cc: Thomas Sugrue  
James D. Schlichting  
Kelly A. Quinn  
Kris A. Monteith  
Blaise A. Scinto  
Patrick E. Forster  
Daniel F. Grosh  
Martin D. Liebman  
Ronald F. Netro  
Wendy Austrie  
William D. Lane  
Susan Kimmel  
Joseph A. Levin  
David Siehl  
John M. Spencer  
Mary Woytek  
Darren Pohlmann  
George Marble

# **Presentation to Federal Communications Commission Wireless Telecommunications Bureau**

**Geometrix®  
Wireless Location System**

**May 4, 2001**

**Grayson**  
WIRELESS  
An Allen Telecom Company



**Geometrix®**  
Wireless Location System

# Grayson Wireless



## Division of Allen Telecom Inc.

- NYSE listed (ALN)
- Eighty years of business history
- Focused on wireless infrastructure and support
- International Manufacturing and Sales
- Eight divisions:
  - \* Decibel Products
  - \* Grayson Wireless
  - \* Comsearch
  - \* Antenna Specialists
  - \* Mikom
  - \* Forem
  - \* Telia
  - \* Tekmar Sistemi

## Grayson Wireless Division

- Wireless Test and Measurement, Infrastructure equipment
- ISO-9001 certified manufacturing facilities
- Over seven years of experience in location systems development
- Location system planning and accuracy prediction tools
- Financial strength & stability to supply and execute
- Products address all cellular and PCS interfaces



## Geometrix® Wireless Location System

- Network-Based, Network-Controlled, Turnkey Location System. Uses Industry-Standard Interfaces.
- Designed for E-911 Phase II Compliance. Can Support Value-Added Services.
- Employs Time Difference of Arrival (TDOA) and Powerful Signal Processing. Supplements TDOA with Angle of Arrival (AOA), as Needed, in Some Rural Applications.
- Compact Common Equipment Supports Cellular & PCS, CDMA, TDMA, AMPS, and iDEN (GSM 2Q01).
- Demonstrated and Field-Test Verified to Meet FCC Phase II Requirements.
- In Production in Grayson's Virginia Plant.
- Available for Immediate Deployment.
- Performance Guaranteed to Meet Customer Specifications.

## E911 Phase II Perspective

- Grayson Recognized as a Leading Vendor of Phase II Location Systems.
- Geometrix Demonstrated With All Supported Air Interfaces To Meet or Better FCC Accuracy Requirements. Demonstrated to FCC Staff March, 2001.
- Geometrix Has Met FCC Accuracy Requirements In All Completed Field Trials.
- Grayson Has Responded to Dozens of Carrier Requests for Proposals and Quotes. Feedback Has Been Positive.
- Grayson Guarantees Performance.
- Carriers Generally Non-Committal, Pending FCC Indication of Resolve. Phase II Waivers Serve as Models and Indicators.